1 2 3 4 5 6 7	Anna Y. Park, CA SBN 164242 Sue J. Noh, CA SBN 192134 Rumduol Vuong, CA SBN 264392 Derek W. Li, CA SBN 150122 U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION 255 East Temple Street, Fourth Floor Los Angeles, CA 90012 Telephone: (213) 894-1083 Facsimile: (213) 894-1301 E-Mail: lado.legal@eeoc.gov		
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9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11	EQUAL EMPLOYMENT OPPORTUNITY	Case No.: 2:16-cv-02187-RFB-PAL	
12	COMMISSION,) JOINT STIPULATION FOR AN ORDER	
13	Plaintiff,	CONTINUING THE DEADLINE TO	
14	vs.	SUBMIT A PROPOSED JOINT PRETRIAL ORDER; [PROPOSED]	
15 16	WYNN LAS VEGAS, LLC; and DOES 1-10,	ORDER; CERTIFICATE OF SERVICE	
17	INCLUSIVE,	[Second Request]	
18	Defendants.	Honorable Richard F. Boulware, II United States District Judge	
19) Officed States District Judge)	
20			
21	Plaintiff United States Equal Employment Opportunity Commission ("EEOC") and		
22	Defendant Wynn Las Vegas, LLC ("Wynn"), by and through their undersigned counsel,		
23	respectfully request that the Court extend the deadline for the parties to submit their Proposed		
24	Joint Pretrial Order in this case due to their concurrent request to continue to the settlement		
25	conference due to a scheduling conflict for the EEOC's counsel. In support of this stipulation		
26	and request, the parties state as follows:		
27	1. On July 10, 2018, the Court denied Wynn's Motion for Summary Judgment and		
28	the EEOC's Motion for Partial Summary Judgm	nent. (ECF No. 38). The Court ordered both	

parties to be referred to the Magistrate Judge for the purposes of scheduling a settlement conference. (*Id.*). The Court also ordered the parties to submit a Proposed Joint Pretrial Order by August 31, 2018.

- 2. Upon the parties' stipulation, the Court on July 18, 2018 ordered the deadline for the parties to file a Proposed Joint Pretrial Order be extended to October 31, 2018 to allow additional time for a settlement conference to be scheduled to see if the case can be resolved before expending further resources for trial. (ECF No. 40).
- 3. Subsequent to the Court's July 18, 2018 Order, Magistrate Judge Leen ordered a settlement conference for October 25, 2018. (ECF No. 42). Due to a conflict with a trial for EEOC's counsel of record, the parties have concurrently filed a stipulation requesting the settlement conference be scheduled to a date starting in late November or early December 2018.
- 4. The parties submit this second request for an extension of the deadline to file a Proposed Joint Pretrial Order to six (6) weeks after the settlement conference to be rescheduled by Magistrate Judge Leen.
- 5. The EEOC and Wynn request an extension of the Proposed Joint Pretrial Order deadline until after the settlement conference is held to conserve resources to maximize the chances of settlement. With the current deadline for the submission of a Proposed Joint Pretrial Order by October 31, 2018, the parties' resources and attention would need to be diverted to prepare a Proposed Joint Pretrial Order. Such resources may be better served to attempt to settle the case first before preparing for trial.
- 6. Thus, the parties request an Order extending the deadline to submit a Proposed Joint Pretrial Order from October 31, 2018 to a date six (6) weeks after the settlement conference to be rescheduled by Magistrate Judge Leen.

1	7. This second request to extend the	deadline to submit a Proposed Joint Pretrial
2	Order is for the reasons stated, and not for any in	mproper reason or delay.
3	3	
4	4 Dated: August 9, 2018	Dated: August 9, 2018
5	5	
6	Derek W. Li	<u>/s/ Scott M. Abbott</u> Scott M. Abbott #4500
7	/ 11	Nicole A. Young #13423 Kamer Zucker Abbott
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11		Attorneys for Defendant Wynn Las Vegas, LLC
12	2 [PROPOSED] ORDER	UPON STIPULATION
13		
14	For good cause shown, IT IS SO ORDER	RED.
15	5	
16	5 Dated: August 10, 2018.	R
17	7 RICHARD	F. BOULWARE, II
18	United Sta	tes District Judge
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	DISTRICT	OF NEVADA
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18	U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION) Case No: 2:16-cv-02187-RFB-PAL
18 19	OPPORTUNITY COMMISSION,	Case No: 2:16-cv-02187-RFB-PAL
18		Case No: 2:16-cv-02187-RFB-PAL CERTIFICATE OF SERVICE
18 19 20	OPPORTUNITY COMMISSION,)))
18 19 20 21	OPPORTUNITY COMMISSION, Plaintiff,)))
18 19 20 21 22	OPPORTUNITY COMMISSION, Plaintiff, vs.)))
18 19 20 21 22 23 24	OPPORTUNITY COMMISSION, Plaintiff, vs. WYNN LAS VEGAS, LLC,)))
18 19 20 21 22 23 24 25	OPPORTUNITY COMMISSION, Plaintiff, vs. WYNN LAS VEGAS, LLC,)))
18 19 20 21 22 23 24 25 26	OPPORTUNITY COMMISSION, Plaintiff, vs. WYNN LAS VEGAS, LLC,)))
18 19 20 21 22 23 24 25	OPPORTUNITY COMMISSION, Plaintiff, vs. WYNN LAS VEGAS, LLC,)))

1 CERTIFICATE OF SERVICE 2 I am, and was at the time the herein mentioned delivery took place, a citizen of the 3 United States, over the age of eighteen (18) years. 4 I am employed in the Legal Unit of the Los Angeles District Office of the United States 5 Equal Employment Opportunity Commission. 6 My business address is U.S. Equal Employment Opportunity Commission, Los Angeles 7 District Office, 255 East Temple Street, 4th Floor, Los Angeles, California 90012. 8 On the date that this declaration was executed, as shown below, I served the following: 9 1. JOINT STIPULATION FOR AN ORDER CONTINUING THE DEADLINE TO SUBMIT A PROPOSED JOINT PRETRIAL ORDER; [PROPOSED] 10 ORDER; CERTIFICATE OF SERVICE 11 12 via the Court's CMECF electronic filing system and/or first class mail / email to Defendant's 13 counsel: 14 Scott M. Abbott Nicole A. Young Kamer Zucker & Abbott Kamer Zucker & Abbott 15 3000 West Charleston Blvd, Suite 3 3000 West Charleston Blvd.. Suite 3 16 Las Vegas, NV 89102 Las Vegas, NV 89102 sabbott@kzalaw.com nyoung@kzalaw.com 17 18 I declare under penalty of perjury that the foregoing is true and correct. Executed on July 19 17, 2018. 20 21 /s/ Derek Li Derek Li 22 23 24 25 26 27

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